EONARD B. SAM

MEMO ENDORSED

March 12, 2008

BY HAND

Hon. Leonard B. Sand United States District Judge Daniel Patrick Moynihan United States District Courthouse 500 Pearl Street, Room 1650 New York, NY 10007 USDC SDNY
DOCUMENT
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DATE FILED: 3-25-08

Re: Re: Lorusso v. Alitalia Linee Aeree Italiane, Spa

07 Civ. 3583 (LBS)(RLE)

Sugar let Mosant

Dear Judge Sand:

We represent Ester Lorusso, the plaintiff, in this employment discrimination case. I write with the consent of the defendant to request an extension of time to file the Joint Pretrial order and to adjourn the pretrial conference. I also ask the court for permission to conduct limited follow-up discovery based on depositions that took place after the close of discovery. Defendant does not consent to further discovery.

Discovery in this case closed on February 11, 2008 with the proviso that two witnesses (employees of defendant) who lived in Rome, Italy, could be deposed after that date. These two witnesses are critical as they were the decision makers. The depositions concluded on January 28, 2008. Another deposition of a key witness, Francesco Gallo, is still pending (due to illness of the witness) and is currently scheduled for March 15, 2008. We respectfully request 45 days to complete follow-up discovery necessitated by these depositions.

The Pretrial Order is due on March 17, 2008 and the pretrial conference is scheduled for March 25, 2008. We request that these dates be adjourned 45 days to April 28, 2008 and May 6, 2008, respectively.

Yours

Robert W. Ottinger

Cc: Alan Koral (by Facsimile)